

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

ISABELA SNEED,  
Plaintiff, }

vs. }

Case No. 22-cv-00031-R

INDEPENDENT SCHOOL  
DISTRICT NO. 16 OF  
PAYNE COUNTY,  
Defendant. }

DEPOSITION OF  
VICTOR GONZALEZ

DATE: MARCH 1, 2023

REPORTER: MARISA SPALDING, CSR, RPR

Spalding Reporting Service, Inc.  
1611 South Utica Avenue, Box 153  
Tulsa, Oklahoma 74104  
spaldingreportingservice@cox.net  
(918) 284-2017

PLAINTIFF'S  
EXHIBIT

tabbles

6

1 but...

2 Q Okay. So I had heard that about his  
3 claim that he had led the --

4 A Yeah.

5 Q -- walkout. I haven't really looked  
6 much into it.

7 A He did a bunch of stuff on Face --  
8 all he did was talk a lot on Facebook.

9 Q Okay. Big talker?

10 A Big talker, nothing doer.

11 Q Okay.

12 A No money where your mouth is.

13 Q I understand. I understand what  
14 you're saying. You guys weren't friends,  
15 correct?

16 A No.

17 Q Okay. I want you -- and I know  
18 you've not been there and it's been some  
19 time since this happened, okay? But I  
20 really want you to try to go back, use your  
21 memory to think about interactions that you  
22 observed with him.

23 There's -- there's a lot of reports from  
24 the police reports that he would -- it  
25 would be very common for him to have female

1 students in his classroom during break  
2 times and then after school. Do you recall  
3 ever seeing that?

4 A The after school, I don't remember.  
5 But during break times, yes, and at lunch.

6 Q Tell me what you remember from break  
7 times and at lunch, just based off your own  
8 observations, what you remember seeing?

9 A All I remember is a lot of girls  
10 going to his -- even 9th grade girls coming  
11 back to the 8th grade hallway to go to his  
12 room during breaks, so then they'd be late  
13 to their 9th grade class.

14 Q Okay.

15 A And then I remember there was --  
16 God, I can't remember his name. I think  
17 he's Irish. He's -- Fieldsend.

18 Q British?

19 A British. Well --

20 Q It came up this morning. That's the  
21 only reason I know he's British.

22 A Fieldsend, yes. He'd always have  
23 the, well, well, Morejon has got his harem  
24 going on over there. I don't know what the  
25 heck is going on over there.

1       Q     Okay. So I'm glad you brought that  
2 up, because that was something I wanted to  
3 ask you about, but I didn't want to load  
4 you up with too many documents just yet.  
5 But since you brought it up, it's kind of a  
6 perfect timing to cover it. So take a look  
7 -- and this -- it's weird.

8       But the third page is kind of where it  
9 starts. It's an email string. It's  
10 Exhibit 15. I'll get you an extra copy.  
11 And then the middle page, it looks just to  
12 be like some Internet script, but then the  
13 first page is the response. And I'll show  
14 you as we walk through it. On the last  
15 page, there's a post from Morejon and he  
16 says -- I'm right here on this third page?

17       A     Okay.

18       Q     He says: During FTC -- or excuse  
19 me. During PTC, whenever I was being a  
20 dedicated baseball coach and working for \$2  
21 an hour, someone came into my room and,  
22 quote, looked (sic) slash stole my Hawaiian  
23 license plate. I honestly forgot about  
24 this, but the kids have put me into  
25 depression today and I randomly remembered

1 the one thing that makes me smile during  
2 the day, the rainbow on the license plate.

3 If anyone has seen this license plate,  
4 please return. I'm really missing it. And  
5 if you look on the first page, our friend  
6 from across the pond says -- Trevor --  
7 sorry.

8 A Trevor Fieldsend.

9 Q Fieldsend, yeah.

10 A Maybe one of your 9th grade female  
11 incurred -- entourage took it for a  
12 souvenir.

13 Q Right. It says: Maybe one of your  
14 9th grade female entourage took it for a  
15 souvenir?

16 A That is -- yeah, that's Fieldsend.

17 Q This seems to be kind of consistent  
18 with what you had testified to about your  
19 9th grade female harem, right?

20 A Uh-huh, they just keep coming. It  
21 was weird. It was odd.

22 Q Yeah, so as a person who is in  
23 education, right, and you're observing  
24 this, it sounds like it was a situation  
25 that was outside of the norm; that it was

1 odd, just based on your view of the  
2 situation; is that fair?

3 A Yes.

4 Q Okay. Do you know Fieldsend very  
5 well?

6 A Just from --

7 Q Coworkers?

8 A Coworkers and we'd -- sometimes we  
9 had lunch together, I mean --

10 Q Okay. But --

11 A -- because we sat in the same room,  
12 so you always have that -- I mean, you  
13 can't laugh. But, you know, British humor,  
14 come on.

15 Q I -- I appreciate it as well. But  
16 you guys weren't like buddies outside of  
17 school?

18 A No.

19 Q Okay. Other than Fieldsend saying  
20 to you, look at Morejon with his harem of  
21 girls, what else -- do you have any other  
22 specific recollections of him talking to  
23 you about any concerns beyond that?

24 MR. PRIDDY: Object to the form.

25 THE WITNESS: The only thing I

1 would say was I think I recall once, that's  
2 probably not a good idea and it's probably  
3 going to get him in trouble at some point.

4 Q (By Mr. Smolen) By having all the  
5 young girls in his classroom?

6 A Yes.

7 Q Okay. During the breaks and during  
8 the lunchtime?

9 A Yeah.

10 Q Okay. Do you know or do you recall  
11 what Trevor did at the school, like what  
12 his position was?

13 A He was -- at one point, he was shop  
14 teacher, but then he -- because they kind  
15 of eliminated that type of stuff. He was  
16 the engineering...

17 Q Someone said that --

18 A At one point, he was like right  
19 across from the hall from --

20 Q From Morejon?

21 A -- Morejon.

22 Q Okay. So he would have been --

23 A So this side all -- it's not, I  
24 mean, him and the -- the typing or computer  
25 teacher would also see that all the time.

1       A     Right.

2       Q     Okay.  There's been testimony prior  
3     to your deposition that it wouldn't be  
4     uncommon for kids to go spend time with a  
5     faculty member during the lunch hour maybe  
6     to catch up on some schoolwork or to get  
7     some extra assistance.  But that generally,  
8     that -- that process was tracked through an  
9     administrator who was in the cafeteria who  
10    would allow the student to go?

11      A     To go, yes.

12      Q     Is that also consistent with your  
13    memory?

14      A     Yes.

15      Q     Okay.  Is it fair to say that if  
16    Morejon had a lot of girls in his classroom  
17    during the lunch hour, that somebody would  
18    have been aware of it through the practice  
19    at the school in receiving permission to go  
20    from the cafeteria or the eating lunch area  
21    to his room?

22      A     I would think so, yes.

23      Q     Okay.  And did you ever have the  
24    responsibility of monitoring the cafeteria  
25    or lunch room?



1       A    I monitored the front, but I didn't  
2 do the hallway, so I -- all I did was try  
3 and keep the chaos calm. Because whenever  
4 I was there, we -- at -- we had every -- we  
5 had just -- what was it? Two lun -- two  
6 lunch -- no, three lunch periods, but we  
7 had split -- I know they had split it up  
8 before I left. We had two -- the three  
9 lunch periods, but we had an A part and a B  
10 part, which cut down on the number of  
11 people that you had in there, because  
12 before it was --

13       Q    Crazy?

14       A    -- jam packed. I mean, it was hard  
15 to keep track of.

16       Q    Okay. There was some testimony  
17 yesterday from Mr. Fields, the former  
18 principal --

19       A    Uh-huh.

20       Q    -- that he thought that generally  
21 there'd be an administrative level employee  
22 who was kind of granting students the  
23 ability to leave and go to the -- down the  
24 hall to the classrooms. Is that consistent  
25 with your memory?

1       A     The cell phone policy was -- well,  
2     phones they're supposed to be off whenever  
3     the teacher is talking is --

4       Q     Okay.

5       A     -- what they're doing.

6       Q     Okay. Do you remember if there was  
7     any kind of written policy or even an  
8     unwritten practice as it pertained to -- or  
9     an expectation, so to speak, as it  
10    pertained to students having communications  
11    with faculty, their teachers, over social  
12    media?

13      A     For the most part, I know out of  
14    practice, it shouldn't happen.

15      Q     I would have thought that --

16      A     I mean, you can see that in your --  
17    in -- in classes that you take, that it's a  
18    fine line. You should not interact.

19      Q     It's a bad idea, right?

20      A     (Moving head up and down)

21      Q     I'm just curious if you ever  
22    remember anyone at Stillwater Public  
23    Schools saying, hey faculty, you can't talk  
24    to students over social media?

25      A     Not directly.

1 Q Okay. Do you ever remember anyone  
2 at Stillwater Public Schools telling you,  
3 hey guys, if a student contacts you over  
4 social media, here's what you're to do?

5 A No.

6 Q Yesterday I took the deposition of  
7 the former principal, who I understand had  
8 been asked to resign his employment. Do  
9 you -- you were there at that time,  
10 correct?

11 A Uh-huh.

12 MR. PRIDDY: Object to the form.

13 Q (By Mr. Smolen) What do you recall  
14 or what do you -- even if it's not direct  
15 knowledge, okay, I want a general  
16 understanding of what your knowledge is  
17 about why he was asked to resign or what  
18 brought about the end of his employment  
19 with the school district?

20 MR. PRIDDY: Object to the form.

21 THE WITNESS: Do you want the  
22 incident?

23 Q (By Mr. Smolen) I want everything  
24 you know about it. And -- and if you -- if  
25 you had direct knowledge of it, I'd like to

1 Q And do you recall if it was the HR  
2 Director that told you, look, those are our  
3 files; we're not okay with that?

4 A No, it was the assistant  
5 superintendent.

6 Q Okay. And who was that at the time?

7 A Cathy Walker.

8 Q And was she the assistant  
9 superintendent the entire time that --

10 A Yes.

11 Q -- you recall these negotiations  
12 happening over those three years?

13 A Yes, those three times I brought it  
14 up, yes.

15 Q Okay. And when do you think -- if  
16 you could give me your best estimate on  
17 timing wise, okay, what years do you think  
18 that it was that you were bringing that up?

19 A Probably from about 2018/2019 up to  
20 -- because last year I didn't do  
21 negotiations. So it would be the year  
22 before that, 2021.

23 Q Okay. So 2018, 2019 through 2021?

24 A Yes.

25 Q Gotcha. Now, how did you come to

1 know about the secret files that were  
2 maintained that were not part of the actual  
3 employee's personnel file? How did you  
4 come to learn about those?

5 MR. PRIDDY: Object to the form.

6 THE WITNESS: More than  
7 anything, I mean, it just -- by word of  
8 mouth and what I found out from other  
9 people as far as involvement like Fields'  
10 case and stuff like that.

11 Q (By Mr. Smolen) Okay. Tell me  
12 about -- did you have a concern that there  
13 might be information out there about  
14 faculty members that only certain people  
15 knew that was not being actually put into  
16 their personnel files as well?

17 A Yes.

18 Q Okay. I understand that you were  
19 wanting, look, after seven years --

20 A I was looking at -- yeah, I was  
21 wanting there to be a fair start and a fair  
22 way of looking at things.

23 Q Transparency?

24 A Right.

25 Q With a limitation on, hey, maybe

1    tried to -- at one point, they gave me the  
2    reasoning that they needed to keep these  
3    files because it was just something that  
4    they kept and it was always done. And then  
5    they gave me the example that those things  
6    are done on a corporate level and all this  
7    other -- so basically trying to justify why  
8    they needed to keep them.

9       Q     Okay.

10      A     And then, of course, they said  
11    that's -- we're not going to go there.

12      Q     Okay. I'm taking by -- we don't  
13    have a camera here on you. But I'm taking  
14    by your body language and your facial  
15    responses that you -- you weren't real  
16    thrilled about that decision?

17      A     No, I was not.

18      Q     Okay. When we talk about it at the  
19    Stillwater level -- and that's what we've  
20    been talking about, okay? I can appreciate  
21    that. But did you have knowledge that that  
22    was a common practice at other school  
23    districts as well, the keep -- the  
24    maintaining of a secret file or was it just  
25    at Stillwater?

1       A     The only place I ever heard about it  
2     was here. I mean, I had taught for eight  
3     years in Houston at Fort Bend ISD, but I  
4     mean, it's a huge district. So, I mean, I  
5     don't know.

6       Q     You don't have knowledge of that  
7     happening at other school districts in  
8     Oklahoma?

9       A     No.

10      Q     Fair?

11      A     That's fair.

12      Q     It was unique to Stillwater?

13      A     Yes.

14      Q     As far as you know?

15      A     As far as I know.

16      Q     Okay. When you worked at Houston,  
17     did they have secret files that weren't  
18     part of an employee's personnel file?

19      A     That I know of, no.

20      Q     Okay. I want to talk with you --  
21     you kind of gave me the general background,  
22     and I really appreciate that on the  
23     education association. When it comes to  
24     the specific incident with Principal  
25     Fields, okay?

1       A     Yes.

2       Q     But what you observed was Principal  
3     Fields just falling over a bench and not  
4     actually assaulting someone?

5       A     And the kid falling over the -- the  
6     kid falling back and then the -- well,  
7     that's how.

8       Q     It looked like a fall as opposed --

9       A     Exactly.

10      Q     -- to an attack?

11      A     Exactly.

12      Q     But then you also understood that  
13     after that incident that happened that you  
14     witnessed, that there were historical  
15     records that had been maintained in a  
16     secret file, not part of Principal Fields'  
17     personnel file, that were ultimately used  
18     to put him in a bad light, to bring about  
19     his resignation?

20               MR. PRIDDY: Object to the form.

21      Q     (By Mr. Smolen) Is that right?

22      A     Right.

23      Q     Okay, I gotcha. I totally  
24     understand that.

25      A     Because somebody may have not liked



1 his position or the way he did things.

2 Q Someone who might have known about  
3 the secret file, might have used the secret  
4 file to get Mr. Fields out of his position  
5 and get someone in there that they wanted,  
6 right?

7 MR. PRIDDY: Object to the form.

8 THE WITNESS: Yes.

9 Q (By Mr. Smolen) That was the idea?

10 A Yes.

11 Q Okay, gotcha. Did you know one way  
12 or the other whether or not there was a  
13 secret file on you?

14 A No, I didn't.

15 Q Okay. Do you know if these files  
16 that were secret and not part of the  
17 personnel file were maintained  
18 electronically or just in writing -- just  
19 in paper?

20 A I don't know.

21 MR. PRIDDY: Object to the form.

22 THE WITNESS: I don't know.

23 Hold on. My phone --

24 MR. SMOLEN: Do you need to take  
25 it?

1 don't see anything wrong, but then we did  
2 not know that he was doing what he was  
3 doing.

4 Q Right. But Fieldsend was at least  
5 picking up on the fact that this is going  
6 to give him problems. He's got a harem of  
7 girls in there day after day?

8 A And it's not like -- everybody had  
9 to have known it. I mean, everybody,  
10 noticed so I would have thought somebody  
11 would have told him, at least the  
12 supervisor.

13 Q Okay. And that you raised a really  
14 good point, because when you're looking at  
15 this on a day-to-day basis and you guys are  
16 in an educational setting and you're doing  
17 it for a long time like you've done,  
18 sometimes things just become so obvious  
19 that certainly someone had to become aware  
20 of it, right?

21 A Uh-huh.

22 Q Would you describe this situation  
23 with Morejon and what Fieldsend described  
24 as the harem of girls to be something that  
25 was so obvious it would be impossible for

1 the administration not to be aware that it  
2 was going on?

3 MR. PRIDDY: Object to the form.

4 THE WITNESS: Yes.

5 Q (By Mr. Smolen) And so as far as a  
6 reporting requirement might go, you felt  
7 like, if I understand your testimony, there  
8 was really nothing to report, because it  
9 was so out in the open that it was so  
10 openly obvious, there was no way the  
11 administration didn't know about it.

12 MR. PRIDDY: Object to the form.

13 THE WITNESS: Right.

14 Q (By Mr. Smolen) Okay. Other than  
15 the conversation with Fieldsend at lunch  
16 that you mentioned, do you recall any other  
17 -- and I understand you maybe had more than  
18 that conversation. But as far as  
19 explicitly having a memory of details of a  
20 conversation, do you have any more than  
21 that one?

22 A No, not really.

23 Q Okay. Let's look at SPS. It is our  
24 Exhibit 9. It is Bates labeled SPS 31.

25 MR. SMOLEN: And, John, I've got